


4. I am informed that plaintiff's counsel seeks to depose me about MBCR's rules and policies and its indemnification agreement with the Massachusetts Bay Transportation Authority ("MBTA"). I am not the person at MBCR with the most knowledge concerning MBCR's indemnification agreement with MBTA, or MBCR's rules and policies. There are other employees at MBCR who specialize in those areas.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 1TH DAY OF MARCH, 2008.



James O'Leary